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Attorneys for the Official Committee of Unsecured
Creditors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor.

Case No. 23-30564

Chapter 11

**DECLARATION OF GILLIAN BROWN
IN SUPPORT OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS' MOTION TO CONSIDER
WHETHER INFORMATION SHOULD
BE SEALED**

I, Gillian N. Brown, declare under penalty of perjury as follows:

1. I am of counsel at the law firm of Pachulski Stang Ziehl & Jones LLP ("PSZJ"), counsel to the Official Committee of Unsecured Creditors ("Committee"). I am duly admitted to practice law in the State of California and the United States District Courts for Northern, Southern, Eastern, and Central Districts of California. I submit this Declaration in support of *THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR AN ORDER AUTHORIZING THE FILING OF A REDACTED COMPLAINT* (the "Motion"),¹ filed herewith. I have personal knowledge of the facts set forth herein unless otherwise stated.

¹ Capitalized terms not otherwise defined have the meanings described in the Motion.

2. On April 18, 2025, I sent letters to counsel for the Debtor; and to counsel for Archbishop Riordan High School, Marin Catholic High School, and Junipero High School (collectively, the “Three High Schools”) requesting that they remove the “Confidential” designation from the Alleged Confidential Documents and inviting counsel to contact me to discuss the request. The letters identified each of the Alleged Confidential Documents by Bates number and requested a response by April 25, which I calculated in accordance with the timeline set forth in the Stipulated Protective Order for resolution of disputes of confidentiality. PSZJ subsequently extended the April 25 response deadline to April 29 and continued discussions thereafter.

3. I sent a substantively similar letter on April 21, 2025 to counsel for Sacred Heart Cathedral Preparatory (“Sacred Heart”, along with the Three High Schools, the “High Schools”), seeking a response by April 29, 2025.

4. Between April 21 and April 30, by email, phone, and/or video conference, I conferred with counsel for Debtor and for the High Schools to discuss the confidentiality of the Alleged Confidential Documents.

5. As of May 5, the Debtor and the High Schools have not agreed to remove any of the “Confidential” designations on their Alleged Confidential Documents.

6. The Committee has concurrently filed an Adversary Complaint that contains redactions of any information derived from Alleged Confidential Documents of the Debtor and the High Schools in accordance with their designation as “Confidential” under the Stipulated Protective Order.

Pursuant to 28 U.S.C. sec. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on May 5, 2025 in Ventura, California.

By: /s/ Gillian N. Brown
Gillian N. Brown